

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.

Case No.: 1:20-cv-09713-LLS

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND LIMITED, ACCIPITER INVESTMENT 4 LIMITED, VERMILLION AVIATION (TWO) LIMITED, WELLS FARGO TRUST COMPANY, N.A., solely in its capacity as OWNER TRUSTEE, and UMB BANK, N.A., solely in its capacity as OWNER TRUSTEE,

Defendants.

**PLAINTIFF'S SECOND AMENDED
DEPOSITION DESIGNATIONS
WITH DEFENDANTS'
OBJECTIONS AND PLAINTIFF'S
RESPONSES**

PLAINTIFF'S SECOND AMENDED DEPOSITION DESIGNATIONS

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Plaintiff Frontier Airlines, Inc. submits its Second Amended Deposition Designations, along with Defendants' Objections and Plaintiff's Responses. Below is the testimony that Frontier presented by deposition:

1. Fabian Bachrach – Deposition Date March 15, 2022

Fabian Bachrach Page:Line	Defendants' Objection	Plaintiff's Response
8:22-25		
10:24-11:19		
30:6-32:22		
58:11-17		
74:16-75:20		
86:11-23		
86:25-87:6		
97:4-98:12		

2. Francis Lee – Deposition Date April 29, 2022

Francis Lee Page:Line	Defendants' Objection	Plaintiff's Response
7:4-7		
7:25-8:1		

Francis Lee Page:Line	Defendants' Objection	Plaintiff's Response
8:7-8:12		
10:6-16		
11:10-19		
13:11-13:25		
34:13-35:4		
46:1-47:13		
70:12-17		
73:4-74:15		
75:8-18		
77:13-78:16		

3. Gerald Ma – Deposition Date April 27, 2022

Gerald Ma Page:Line	Defendants' Objection	Plaintiff's Response
9:16-19		
10:3-4		
10:8-9		
11:12-15		
12:15-23		
13:9-24		
14:4-17		
15:11-14		
16:17-17:6		
18:4-12		
18:22-19:6		
19:10-15		
19:24-20:1		
23:9-24:18		
26:9-27:1		
27:12-14		
28:8-25		
31:10-32:4		
40:7-40:22		
41:17-42:7		
46:3-48:1		
55:4-60:19		
60:21-22		
68:9-25		
69:14-70:2		
70:7-74:3		
75:4-76:3		
76:11-77:4		
78:5-23		

Gerald Ma Page:Line	Defendants' Objection	Plaintiff's Response
80:24-81:14		
83:13-84:2		
84:5-85:7		
85:13-88:11		
92:13-93:24		
96:6-13		
96:24-98:17		
100:13-102:5		
102:16-103:6		
104:23-106:16		
107:21-109:11		
110:16-20		
110:22-111:11		
111:13-24		
115:7-116:23		
117:5-20		
118:6-15		
118:19-120:21		
125:7-10		
125:24-127:2		
131:2-7		
136:20-138:25		
139:9-140:15		
144:12-145:10		
145:14-146:9		
146:25-149:16		
150:13-153:2		
154:1-158:15		
158:22-161:10		
162:8-164:6		
165:3-166:1		
168:14-20		
171:2-23		
172:24-173:15		
174:4-175:5		
175:7-176:2		
177:2-177:12		
177:15-178:6		
178:23-179:2		
180:2-181:1		
182:21-183:25		

4. Michael McInerney – Deposition Date March 11, 2022

Michael McInerney Page:Line	Defendants' Objection	Plaintiff's Response
10:1-4		
12:18-14:5		
14:13-14:24		
19:3-20:21		
21:2-22:1		
23:5-11		
23:22-24:8		
26:3-17		
27:22-24		
28:23-29:16		
38:14-21		
40:15-21		
42:18-43:15		
50:3-9		
51:5-11		
52:8-14		
53:25-54:4		
55:22-56:5		
59:7-60:2		
62:19-25		
63:19-63:24		
66:3-67:12		
69:1-21		
70:10-71:2		
71:11-21		
94:25-95:10		
95:15-95:24		
98:11-99:18		
99:20-100:22		
103:4-104:4		
104:17-105:13		
108:21-109:15		
131:24-132:3		
132:5-12		
134:1-19		

5. Ronan Murphy – Deposition Date March 21, 2022

Ronan Murphy Page:Line	Defendants' Objection	Plaintiff's Response
6:9-12		
8:24-10:2		

Ronan Murphy Page:Line	Defendants' Objection	Plaintiff's Response
10:19-11:5		
12:17-25		
16:4-17		
17:22-18:3		
18:7-19:2		
19:5-18		
21:2-4		
21:22-23:2		
26:13-27:7		
51:22-52:10		
55:15-25		
77:6-16	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
78:4-22	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
79:18-83:5	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
92:10-94:25		
106:9-10	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
108:19-110:24	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.

Ronan Murphy Page:Line	Defendants' Objection	Plaintiff's Response
135:21-136:4	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
136:20-137:18	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.

6. Jane O'Callaghan – Deposition Date March 23, 2022

Jane O'Callaghan Page:Line	Defendants' Objection	Plaintiff's Response
6:7-11		
7:4-13		
9:2-12		
9:22-11:3		
17:20-18:10		
19:19-21:15		
66:4-67:22		
68:7-70:21		
70:22-71:11		
75:25-76:4		
78:12-80:19		
88:5-91:6		
94:3-17	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
95:16-97:5	Document discussed has not been identified as a trial exhibit	Will not display document during testimony.
97:22-99:4	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.

Jane O'Callaghan Page:Line	Defendants' Objection	Plaintiff's Response
104:24-106:4	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
107:25-110:22		
112:17-117:20		
118:14-120:9		
120:20-121:25		
123:15-125:7		
125:8-128:11		
128:23-133:10		
133:13-135:3		
138:11-19		
139:4-144:23		
145:8-146:6		
147:12-148:12		
148:19-150:20	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
151:18-152:8		
153:9-154:8		
161:4-162:19		
170:19-177:4		
180:8-20		
181:10-182:21		
184:15-187:22		
188:2		
202:14-18		
204:10-14		
205:18-209:24		
210:4-8		
210:15-24		
211:19		

Jane O'Callaghan Page:Line	Defendants' Objection	Plaintiff's Response
212:16-213:2	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
217:2-221:9		
222:9-13		
222:24-223:19		
224:21-226:3		
229:4-7		
245:9-247:4		
248:18-254:16		
256:19-24		

DATED: May 7, 2024

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